

JAMES G. KELLAR  
EDWARD J. LENTZ  
JOSEPH A. FITZPATRICK, JR.  
JOSEPH A. BUBBA  
TIMOTHY D. CHARLESWORTH  
DONNA M. MILLER  
DOUGLAS J. SMILLIE\*  
EMIL W. KANTRA II  
MARK D. AURAND  
JOSEPH S. D'AMICO, JR.\*  
MICHAEL R. NESFEDER  
CATHERINE E. NAUGHTON DURSO  
JANE P. LONG  
NANCY CONRAD\*  
ERICH J. SCHOCK  
RONALD J. REYBITZ  
BRIAN E. O'NEILL  
ALBERTINA D. LOMBARDI\*  
EDWARD J. ANDRES  
GEORGE R. BARRON

**FITZPATRICK LENTZ & BUBBA, P.C.**

ATTORNEYS AT LAW  
4001 SCHOOLHOUSE LANE  
P.O. BOX 219  
CENTER VALLEY, PA 18034-0219

dsmillie@flblaw.com

TELEPHONE (610) 797-9000  
TELEFAX (610) 797-6663  
WEBSITE: www.flblaw.com

NEW JERSEY OFFICE:  
301 NORTH CHURCH STREET  
SUITE 220  
MOORESTOWN, NJ 08057  
TELEPHONE: (856) 727-9600

July 25, 2002

\*Also admitted in New Jersey

Kevin T. Fogerty, Esquire  
Mill Run Office Center  
1275 Glenlivet Drive  
Suite 150  
Allentown, PA 18106

**RE: Safeco Insurance Company of America v.  
Joacquin DeMatos, Donna DeMatos and Maria DeMatos  
Civil Action No. 02-2899 (E.D. Pa.)**

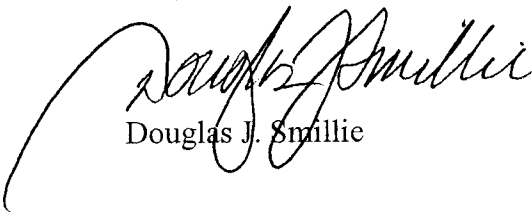
Dear Kevin:

As we discussed, I was on vacation during the week of July 8, 2002 when the Plaintiff's First Amended Complaint was received at my office. Therefore, I require a brief extension of time within which to file an Answer to the First Amended Complaint. I expect to be able to accomplish this by July 31, 2002 at the latest. If this presents any problems, please give me a call at your earliest convenience.

In addition, I have just forwarded your letter to my clients and will discuss with them Safeco's requests for financial information and the establishment of a "escrow" account. I am aware that the Court has recently entered an Order requiring that you and I conduct a conference, and hope that we can address the issues raised in your letter of July 8, 2002 at that time.

If you have any questions or comments in the interim, please let me know.

Very truly yours,

  
Douglas J. Smillie

DJS/kl

**EXHIBIT A**